

REMARKS**I. General**

Claims 1-26 are currently pending in the application. Claims 16-20 have been indicated as allowed. Claims 4-7, 10-14 and 24-26 are objected to as being dependent on a rejected base claim. Applicant thanks the Examiner for the indication of allowable subject matter.

Claims 1-3, 8-9, 15, 22 and 23 stand rejected. Applicant respectfully requests reconsideration of the application in view of the following remarks.

II. Rejections under 35 U.S.C. § 102

Claims 1, 15 and 21 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Bullmore.

Applicant first turns to independent claim 21. Claim 21 includes a limitation for “a third circuit coupled to the first circuit and the second circuit for activating one of the first circuit and the second circuit and deactivating the other of the first circuit and the second circuit based on whether the switch is a normally-closed switch or a normally-open switch, respectively.” This claimed third circuit performs the functions recited in allowed claim 16 for “activating a normally-open detection circuit and deactivating a normally-closed detection circuit if the switch is a normally-open switch; and activating the normally-closed detection circuit and deactivating the normally-open detection circuit if the switch is a normally-closed switch.” Thus, claims 16 and 21 appear to be analogous method and apparatus claims, and claim 21 should be in condition for favorable action and allowance for at least the reasons recited by the Examiner in connection with the indication of allowance for claim 16. Withdrawal of the rejection to claim 21 is requested.

With respect to claim 1, Applicant claims that the “first monitoring circuit” is “coupled to a switch.” Applicant further claims that the first monitoring circuit is comprised of “a normally-open detection circuit” and “a normally-closed detection circuit.” Importantly, claim 1 recites that the normally-open and normally-closed detection circuit perform detection operations with

respect to the switch to which the first monitoring circuit is coupled. In other words, the normally-open and normally-closed detection circuit operate on the SAME switch. This structure is quite distinct from that taught by Bullmore, and on that basis there is no anticipation of the claimed invention.

More specifically, Applicant points out that Bullmore teaches three different switches: SWA, SWB and SWC. Importantly, each of those switches is associated with a separate "circuit monitoring device" (see references, 10, 20 and 30, respectively). Thus, it is clear in Bullmore that ONE circuit which operates as a normally-open detection circuit AND ANOTHER circuit which operates as a normally-closed detection circuit are not provided and further are NOT coupled to the same switch.

This structural difference is significant because claim 1 further recites "a configuring circuit, coupled to the first monitoring circuit, for configuring the first monitoring circuit to utilize one of the normally-open detection circuit and the normally-closed detection circuit based on the switch configuration." The configuring circuit thus operates, based on whether the single switch at issue is normally-open OR normally-closed, to USE one or the other of the normally-open detection circuit and the normally-closed detection circuit. This functional operation is neither taught nor suggested by Bullmore.

Rather, Applicant submits that Bullmore is directed to both a different structural interconnection and a different functional operation than the claimed invention. Bullmore teaches the coupling of an individual circuit monitoring device (10, 20, 30) to each separate switch (SWA, SWB, SWC). While these devices 10, 20, 30 are configurable to detect one of normally-open or normally-closed switch operation, it is clear that no selected UTILIZATION of the devices 10, 20, 30 is being made. Instead, all three devices 10, 20, 30 are always in use, but can be configured for different switch detections. This is distinct from the claimed structure where the separate normally-open and normally-closed detection circuits (of the first monitoring circuits) are coupled to one switch and then a configuration is performed wherein one of the

normally-open and normally-closed detection circuits selectively utilized based on switch type. There accordingly is no teaching or suggestion in Bullmore for the claimed invention.

Claim 15 is a dependent claim from claim 1 which is patentable over Bullmore for at least the same reasons as claim 1.

Claim 21 recites that the first and second circuits are coupled to a first conduction terminal of a same/common switch. Again, as discussed above, Bullmore teaches separate circuits 10, 20, 30 being coupled to separate switches SWA, SWB, SWC. The first circuit in claim 21 detects an opening condition of the switch, while the second circuit in claim 21 detects a closing condition of the same switch. The claimed third circuit in claim 21 is coupled to the first and second circuits and selectively activates one of the circuits while deactivating the other of the circuits based on whether the switch at issue, which is coupled to both first and second circuits, is either of the normally-open type or of the normally-closed type.

As discussed above in connection with claim 1, the Bullmore reference fails to teach or suggest either one of the structure or operation as claimed by Applicant in claim 21. Instead, Bullmore focuses on separate circuits 10, 20, 30 for separate switches SWA, SWB, SWC. Bullmore fails to teach having separate normally-open and normally-closed detection circuits operate on the SAME switch. Bullmore further focuses on configuring each individual circuit 10, 20, 30 to be either normally-closed detecting or normally-open detecting. Bullmore fails to teach the use of a circuit to selectively activate one or the other of two circuits which are coupled to the SAME switch in order to perform normally-open or normally-closed detection based on whether that one switch is of the normally-open or normally-closed type. There accordingly is no teaching or suggestion in Bullmore for the claimed invention.

III. Rejections under 35 U.S.C. § 103

Claims 2-3, 8-9 and 22-23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bullmore in view of Youssef. Claims 2-3, 8-9 and 22-23 depend from one of base claims 1, 16, or 21 and thereby inherit all of the limitations of their respective base claim. The proposed combination does not teach each and every element of the claims. Applicant asserts that claims 2-3, 8-9 and 22-23 are patentable over the proposed combination, at least, because of their dependence from patentable independent claims.

In view of the above amendment and remarks, Applicant believes the pending application is in condition for allowance.

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